

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In Re: John Thomas Joyce Jr. : **Chapter 13**
Susan Kimberly Pindar :
Debtors : **Bankruptcy No. 17-10758-AMC**
: **Motion to Allow Debtors to Proceed**
: **With A Loan Modification**

CERTIFICATION OF NO RESPONSE

I, Jeffery A. Fournier, Esquire, attorney for Debtor, hereby certifies the following:

1. That a Motion to Allow Debtor to Proceed with a Loan Modification was filed on May 5, 2017.
2. Notice was served upon all creditors and interested parties on or about May 5, 2017.
3. More than twenty (20) days have lapsed and there has been no response by creditors or interested parties.

WHEREFORE, Debtors/Movants respectfully request that the Motion to Allow Debtor to Proceed with the Trial Period Plan and Loan Modification be approved.

/s/ Jeffery A. Fournier, Esquire
Jeffery A. Fournier, Esquire
Attorney for Debtors/Movants